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June 11, 2020

Laura Castrilli, RCRA Corrective Action, Permits and PCB Unit
U.S. EPA Region 10
1200 Sixth Ave., Suite 155
Seattle, WA 98101-3140

RE: US Ecology Idaho, Inc. (USEI) Grand View, Idaho - EPA ID# IDD073114654
Polychlorinated Biphenyl (PCB) Processing Building Sample Analysis Plan Submittal

Dear Ms. Castrilli:

In accordance with TSCA Approval Condition I.K, USEI is hereby submitting the Sampling Analysis Plan (SAP) requested in your letter, dated April 13, 2020. The PCB Sampling Analysis Plan is included with this letter. A diagram showing locations of each sample in proximity to the PCB Processing Building is included as Attachment A to the SAP. All sample results, including those from the sump water and sump solids will be submitted in a separate report once the soil sampling is complete and analytical results have been received from the laboratory.

If you have any questions or comments regarding this material, please feel free to contact me or Rebecca Hogaboam at (208) 834-2275.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Regards,

Noel Bailey
Technical Manager

Enclosures

cc: Mr. Brian English, IDEQ (Electronic Copy Only)
Mr. Daryl Sawyer, IDEQ (Electronic Copy Only)
Ms. Michelle Mullin, USEPA Region 10 (Electronic Copy Only)

US Ecology Idaho – PCB Sampling Analysis Plan

Scope

The purpose of the Sampling Analysis Plan (SAP) is to outline the procedure US Ecology Idaho (USEI) will use to determine whether PCBs have contaminated the soil surrounding the perimeter of the PCB Process Building and if so, to determine the extent of the contamination.

History

The PCB Process building was built on a 50'x60' foot steel containment pad with a 3-inch welded steel plate floor and an 8-in steel curb. The building portion was a 40' x 50' enclosed wood-framed building with metal siding. The additional 20' x 50' area was an unenclosed steel pad used for staging, receipt, and processing activities. All secondary containment dikes and curbs are continuous. No valves are located in any containment dike that might accidentally allow contained liquid to drain from the secondary containment area.

Until November 17, 2018, the PCB Process Building had historically been used to process PCB items such as TSCA-regulated transformers and bushings that required additional handling such as draining and/or flushing prior to landfill disposal. The building was also used for storage prior to off-site shipment for TSCA-regulated materials, such as PCB oil, flushate from transformer decommissioning, and large capacitors that required incineration.

Sample Collection

To determine the extent of the potential PCB contamination, characterization will be performed as outlined in 40 CFR §761.61(a)(2) and 40 CFR §761 Subpart N.

USEI will develop a grid system and collect samples along the perimeter of the PCB building. These samples will be collected as close to the edge of the building as possible. Samples along the perimeter will be spaced out every 3 meters. A second set of samples will be collected 1.5 meters out from the edge of the building and in-line with the samples collected in the first set.

Based on this grid system USEI expects to collect approximately 56samples. A general layout of the approximate sampling locations is included as Attachment A.

Samples will be collected per 40 CFR §761.286 using USEI staff. A representative sample consisting of approximately 500 grams will be collected from each location. Each discreet sample will be collected using a clean stainless steel spoon and contamination free glass jar provided by the analytical laboratory. As required by EPA SW-846, collected samples will be chilled to 4° C.

Each jar will be labeled with the unique sample ID and a properly completed chain of custody (COC) will be filled out. The signed COC will be placed in the sample cooler along with the samples.

Samples will be shipped too ALS Environmental in Holland, MI. ALS Environmental is a certified laboratory.

Laboratory Analysis and Reporting

Per 40 CFR §761.272 samples will be extracted using either Method 3500B/3540C or Method 3500B/3550B from EPA's SW-846. EPA Method 8082A will be used to analyze the sample extract.

Per 40 CFR §761.274 sample concentrations for non-liquid PCBs will be reported on a dry weight basis as micrograms of PCBs per sample (ppm by weight or as mg/kg).

Conclusion

USEI will not commence sampling until the SAP is approved by EPA Region X. After all final sample results have been reviewed by USEI the facility will provide EPA Region X a summary report outlining the findings. In the event PCB contamination is found USEI will rely on 40 CFR §761.61 (a)(4)(i) for clean-up standards. The area is considered a low occupancy area with the cleanup level for PCBs to be ≤ 25 ppm. Any area that is found to be above 25 ppm PCBs will be remediated and resampled for verification purposes.

Attachment A

US Ecology Idaho, Inc.
PCB Sampling Analysis Plan

June 11, 2020

Key

- 1m x 1m area
- Soil Sample Point
- #000 Soil Sample Number